

EXHIBIT

“D”

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1 Q. -- with regard to this case?

2 Okay. When did you decide
3 to bring this lawsuit?

4 A. Oh, approximately, November
5 of 2014.

6 Q. And what prompted you to
7 bring this lawsuit?

8 A. Wells Fargo was calling me a
9 phone -- on a phone.

10 Q. Okay. Did anyone suggest to
11 you to bring this lawsuit?

12 A. Suggest to bring a lawsuit?
13 Yes.

14 Q. Who?

15 A. Randy Miller.

16 Q. Who is Randy Miller?

17 A. My best friend from Lincoln,
18 Nebraska.

19 Q. Okay. And why did
20 Randy Miller suggest that?

21 A. Well, he was the first to
22 mention the possibility of me doing TCPA
23 violations as a business.

24 Q. Okay. So are you bringing

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1 these lawsuits as a business?

2 A. Yes, I am.

3 Q. Have you -- you've filed
4 other TCPA lawsuits, correct?

5 A. Yes, ma'am.

6 Q. How many?

7 A. Approximately, nine, I
8 believe. I don't know how many.

9 Q. Against whom?

10 A. Comenity, Credit One,
11 Navient, Wells Fargo.

12 Q. Why did you file so many
13 lawsuits?

14 A. Because I'm allowed to.

15 Q. What do you mean by you're
16 allowed to?

17 A. They're calling my number as
18 a wrong party, and I've told people
19 that -- I've told them not to call and
20 they continue to call.

21 Q. Does your current attorney
22 represent you in all of those lawsuits?

23 A. Yes, ma'am.

24 Q. Have you brought any

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1 pre-litigation matters?

2 A. I don't understand that
3 question.

4 Q. Any -- have you made or
5 tried to make claims against a company
6 prior to suing them, like a demand?

7 A. Yes, ma'am.

8 Q. A demand for -- okay.

9 How many of those have you
10 brought or how many demand letters have
11 you sent out?

12 A. Oh, approximately, 20.

13 Q. Okay. And have you sent
14 them yourself or were you represented?

15 A. I was -- I did send them
16 myself.

17 Q. Okay. Were you represented
18 for any of those demand letters that you
19 sent out?

20 A. Prior to knowing my
21 attorney?

22 Q. No. Post knowing your
23 attorney?

24 A. Oh, since knowing, yes. I

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1 person?

2 A. Correct.

3 Q. Okay. Do you have any other
4 attorneys?

5 A. Michael Manning.

6 Q. Okay. Other than Michael
7 Manning, do you have any other attorneys?

8 A. No, ma'am.

9 Q. Okay. Were you -- you
10 mentioned looking on the Internet, but
11 were you referred to this attorney by
12 anyone?

13 A. No, ma'am.

14 Q. Okay. What is your cell
15 phone number?

16 A. My cell phone number?

17 Q. Yes.

18 A. My personal cell phone
19 number?

20 Q. Yes.

21 A. 860-729-4777.

22 Q. I also have an 860 cell
23 phone number.

24 A. Oh, you do?

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1 A. Yes, ma'am.

2 Q. More than 40 cell phone
3 numbers? Getting up there.

4 A. Yes. Yes. Yes. Can I tell
5 you how they fit when I brought them
6 here?

7 Q. Sure.

8 A. They fit in a shoebox.

9 Q. Okay.

10 A. Does that give you a...

11 Q. Not really.

12 A. Okay.

13 Q. I don't know how big they
14 are. Okay.

15 So at the point of 40 would
16 you say that you can't estimate? Do you
17 have more than 40 cell phone numbers or
18 you cannot say?

19 A. I don't know.

20 Q. You don't know. Okay. But
21 you have more than 35?

22 A. I do.

23 Q. And you don't know if you
24 have more than 40?

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1 A. I don't. I'm sorry.

2 Q. Okay.

3 A. I don't count them. I
4 haven't counted them.

5 Q. Okay. Do you know what
6 those cell phones numbers are as in do
7 you know the phone numbers themselves?

8 A. I don't.

9 Q. You don't. Okay.
10 Do you know what phone
11 numbers Wells Fargo Bank called you on?

12 A. No, I don't.

13 Q. Not offhand?

14 A. Not offhand, no.

15 Q. Okay. Why do you have so
16 many cell phone numbers?

17 A. I have a business suing
18 offenders of the TCPA business -- or
19 laws.

20 Q. And when you say business,
21 what do you mean by business?

22 A. It's my business. It's what
23 I do.

24 Q. So you're specifically

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1 buying these cell phones in order to
2 manufacture a TCPA lawsuit? In order to
3 bring a TCPA lawsuit?

4 A. Yeah.

5 Q. In what span of time did you
6 purchase these cell phones?

7 A. From approximately June of
8 2014.

9 Q. To? Starting in June of
10 2014?

11 A. Yes.

12 Q. Okay. Did you purchase them
13 all at the same time?

14 A. No, ma'am.

15 Q. Okay. In what time frame
16 did you acquire the cell phones, the
17 approximately 35 plus cell phones?

18 A. 'Til maybe approximately two
19 months ago.

20 Q. Okay. Are you continuing to
21 buy cell phones?

22 A. I have not. Two months ago
23 I have not.

24 Q. Okay. Why did you stop?

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1 Q. And where are you buying
2 these phones?

3 A. I've bought them different
4 places. WalMart, Dollar General.

5 Q. Okay.

6 A. And from Tracfone
7 themselves.

8 Q. Okay. Do you buy them for
9 yourself or for someone else?

10 A. No. I buy them for myself.
11 These are my phones.

12 Q. Were you told by anybody to
13 buy the phones?

14 A. No.

15 Q. Okay. You had mentioned a
16 Randy. Did Randy tell you to buy phones?

17 A. We talked about it, but he
18 didn't tell me to do it. I did it on my
19 own.

20 Q. Okay. How did you first get
21 the idea to buy phones? Was it from
22 Randy?

23 A. Yes. We talked almost
24 daily, and he suggested it.

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1 Q. Okay. What cell phone
2 numbers are you claiming Wells Fargo
3 called in this case?

4 A. I don't have that. I can
5 look.

6 Q. Okay.

7 A. If you would like me to
8 look?

9 Q. Go ahead.

10 A. 305-815-4589 and the other
11 one is 863-398-6128.

12 Q. Okay. Who is the cell phone
13 provider for these phones?

14 A. Tracfone.

15 Q. Do you have a log-in name
16 and password for Tracfone?

17 A. No, I don't.

18 Q. When you purchase these
19 phones, walk me through the process of
20 how these cell phones get activated?

21 A. I use my cell phone and I
22 dial the number, and they ask me what ZIP
23 code I want to put it in, and they also
24 ask me the serial number.

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1 Q. Okay. And so you -- do you
2 select the ZIP code?

3 A. Yes, I do.

4 Q. And what ZIP code did you
5 select or do you select?

6 A. Normally, Florida number --
7 Florida ZIP codes.

8 Q. And why is that?

9 A. Because there's a depression
10 in Florida.

11 Q. Okay. So you're -- what do
12 you mean by there's a depression in
13 Florida? Why are you selecting a Florida
14 number?

15 A. I knew that people had
16 hardships in Florida, that they would be
17 usually defaulting on their loans or
18 their credit cards.

19 Q. Okay. So is there another
20 purpose that you use these cell phones
21 for other than --

22 A. No.

23 Q. -- to -- no.

24 So the purpose is to bring a

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1 TCPA lawsuit?

2 A. Correct.

3 Q. Does anyone you know ever
4 call you at these phone numbers?

5 A. No, ma'am.

6 Q. Did you ever use any of
7 these phone numbers to call anyone?

8 A. No, ma'am.

9 Q. For the two phone numbers
10 specific to this case, I'm just going to
11 call them by the last four digits, the
12 4589 number and the 6128 number, when did
13 you purchase those phones?

14 A. Approximately, September
15 2014, I believe. I just really don't
16 know. I have no way of knowing.

17 Q. Okay. Is that -- do you
18 know where you bought these two specific
19 phones?

20 A. No, I don't.

21 Q. Did you have to purchase a
22 coverage plan?

23 A. No. They're prepaid.

24 Q. Okay. And they're prepaid

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1 for how many minutes?

2 A. Initially, 60 minutes.

3 Sixty minutes. No. No. No. No. Ten
4 minutes for 60 days. I'm sorry.

5 Q. Okay. And did you ever add
6 minutes to these phones?

7 A. Yes, I did.

8 Q. Do you know if you added
9 minutes specifically to the two phone
10 numbers at issue here?

11 A. Yes, I did.

12 Q. Okay. How many minutes did
13 you add?

14 A. I have no way of knowing.

15 Q. How much does it cost to add
16 minutes?

17 A. I use a 19.99 airtime card.

18 Q. And how many times have you
19 added minutes to the various --

20 A. I have no way of knowing.

21 Q. Okay. Have you added
22 minutes to almost all of the 35 phones?

23 A. Yes, ma'am.

24 Q. Okay. And the purpose of

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1 adding minutes is so that they
2 will -- these phones will receive more
3 calls?

4 A. Correct.

5 Q. Do you ever have to provide
6 information, personal information when
7 purchasing these cell phones?

8 A. No.

9 Q. Do you have to provide an
10 address?

11 A. No.

12 Q. Do you have to provide
13 another cell phone number or anything
14 like that?

15 A. No, ma'am. I would like to
16 clarify that. You can add -- you can but
17 there's also an opt out option of
18 not -- and I haven't provided. You
19 either can or you can't.

20 Q. Provide personal information
21 when buying these phones?

22 A. Correct. Correct. Correct.

23 Q. Okay. So did you
24 specifically choose just the area code or

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1 Q. So 863 is Lakeland, Florida,
2 to your understanding?

3 A. That's correct.

4 Q. And so is 305. Is that
5 correct?

6 A. No. It's Orlando, I
7 believe.

8 Q. Okay.

9 A. I'm not positive.

10 Q. Okay. So then the state,
11 Pennsylvania, that's just indicating
12 Flinton, Pennsylvania where you were
13 living?

14 A. Correct.

15 Q. Is that correct? Okay.
16 How did you use this phone
17 number after it was activated, if at all?

18 A. For my business.

19 Q. Okay. When you say for your
20 business, what do you mean?

21 A. Suing clients like yours,
22 Wells Fargo, for violating the TCPA.

23 Q. Okay. So would you
24 keep -- you mentioned a shoe box. Would

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1 you just keep the phone in a shoe box?

2 A. No. No. No. No. You have
3 to -- you have to plug them in to keep
4 them active, batteries active.

5 Q. Okay. And then what would
6 you do with these phones? Would you wait
7 for them to ring?

8 A. Yes.

9 Q. Okay. And then when they
10 ring, what would you do?

11 A. I would -- different --
12 different ways. I would initially pick
13 it up to see who it was and document that
14 or I would -- if I had already told them
15 not to call, I would just document it on
16 a log that you've -- I believe you have.

17 Q. Did you -- was it your
18 practice to pick up each of the phones
19 when they rang the first time?

20 A. I would try to, yes.

21 Q. Okay. And when you picked
22 it up, you indicated that you would find
23 out who was calling?

24 A. Correct.

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1 Q. Did you also indicate to
2 those callers to stop calling?

3 A. Yes. Some of the times.
4 Not all of the times. I would have to
5 look at my logs.

6 Q. Okay. And when you picked
7 up the phone -- do you know if you picked
8 up the phone ever with regard to Wells
9 Fargo?

10 A. Yes.

11 Q. And do you know if you spoke
12 with someone?

13 A. Yes.

14 Q. Okay. Do you have any idea
15 who you spoke with?

16 A. I would have to see my logs
17 to...

18 MS. GUPTA: Okay. We'll go
19 ahead and mark plaintiff's
20 discovery responses as Exhibit-9.
21 I'll give you a copy. Here you
22 go.

23 MR. FREEMAN: Do you have a
24 copy for yourself?

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1 A. Okay. So the first time it
2 looks like I picked up was 9/24 at 2:19,
3 and I told whoever I thought at that time
4 was there, which I was informed later
5 that there was nobody there; I told them
6 not to call, and I documented that nobody
7 was there.

8 Q. Nobody was there as in you
9 didn't actually communicate with anybody?

10 A. That's correct.

11 Q. Okay. So there was nobody
12 you told not to call?

13 A. Correct.

14 Q. Okay. But you are
15 indicating here that you answered the
16 phone?

17 A. Correct.

18 Q. Okay. On the 10/2 -- is
19 that 10/2, the next call?

20 A. At 1:23 or 1:26.

21 Q. 1:26, did you answer the
22 phone on that day?

23 A. No.

24 Q. No. Okay. Then how do

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1 Q. So from your notation, did
2 you ever speak to someone?

3 A. There, no. No, ma'am.

4 MR. FREEMAN: Are you asking
5 about that day?

6 MS. GUPTA: Yes.

7 BY MS. GUPTA:

8 Q. On 9/16, I'm just trying to
9 interpret from --

10 A. My notes?

11 Q. Yeah. Your notes. So you
12 tried to call, but you never spoke to
13 somebody --

14 A. Correct.

15 Q. -- correct? Okay.

16 How about the next notation
17 here on this log where it starts with
18 "answered phone." It's next to a
19 notation -- or next to a date of 9/22,
20 but I don't know if that's the date.

21 A. 9/22, 6:35 -- at 6:35?

22 Q. Yeah.

23 A. What I notate there is I
24 answered the phone and told them to quit

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1 calling. Nobody was there, though.

2 Q. Okay. So, again, you did
3 not speak to anybody?

4 A. No. Correct.

5 Q. Okay. So instead of going
6 through each of the subsequent notations,
7 I will let you take a look at it
8 yourself.

9 Did you -- based on these
10 notations, did you ever speak to anybody
11 at Wells Fargo? And you can look at the
12 next page, too, and take your time.

13 A. On this page I did not.

14 Q. On this page you did not.
15 Okay. On Stoops 009 you did not. Okay.

16 A. At the top it says 2 of 4.

17 Q. Yes.

18 A. I did speak to somebody

19 10/21 --

20 Q. Okay.

21 A. -- at 7:53.

22 Q. Okay.

23 A. Oh, no. I apologize.

24 Tracfone has a problem that some of the

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1 times, the date will go back and revert
2 back to one, one. Why it does that, I
3 don't know. So what I put here is it
4 should have been 10/21 at approximately
5 4:15. Then I write my note. I spoke to
6 Yolanda and told her I'm not the person
7 she's trying to reach, stop calling me.

8 Q. Okay. And so on 10/21 you
9 did speak to an agent?

10 A. Yolanda. Correct.

11 Q. Yolanda. Okay. And do you
12 know the exact words you used or you
13 don't?

14 A. No.

15 Q. Okay. Was that the first
16 time that you communicated with anybody
17 at Wells Fargo directly?

18 A. Yes.

19 Q. Okay. Were there any other
20 times that you spoke with anybody at
21 Wells Fargo?

22 A. Yes.

23 Q. When?

24 A. On 10/23, 1:28, I put down

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1 that call will be monitored. A Miriam
2 answered. It was very hard to hear her.
3 I told her I'm not the person they are
4 trying to reach, to stop calling.

5 Q. Okay. Is that it for the
6 document marked Stoops 10 in terms of
7 anybody you spoke to? You're saying that
8 you spoke to a Yolanda and you spoke to a
9 Miriam. Is that correct?

10 A. Correct.

11 Q. Okay. Anybody else on this
12 date?

13 A. I tried to call again on
14 10/21/14, the phone number, and, again,
15 they asked me for a mortgage number, and
16 I did not have it. So they wouldn't send
17 me to a real person.

18 Q. I see. Okay. How about the
19 next page?

20 A. Oh, I did speak on 11/14.

21 Q. Yeah.

22 A. 12:31 Chris Green called me.

23 Q. Okay.

24 A. And I did tell him that, by

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1 anything else to document phone calls to
2 your phone number, to these cell phone
3 numbers, to these two cell phones numbers
4 at issue here?

5 A. No.

6 Q. Did you use any sort of an
7 app, an application --

8 A. No.

9 Q. -- for tracking phone calls?

10 A. No.

11 Q. Did you ever block phone
12 calls?

13 A. No.

14 Q. Okay. Did each of the calls
15 that -- ring through to your phone that
16 you've indicated on your log?

17 A. Ring through to --

18 Q. To these two phones?

19 A. Yes.

20 Q. So you indicated, we just
21 went through the logs, that you spoke
22 with a Yolanda and you spoke with a
23 Miriam?

24 A. Correct.

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1 Q. Based on your notations, is
2 it your testimony that you told those two
3 individuals to stop calling the cell
4 phone?

5 A. Correct.

6 Q. Okay. Was there any other
7 way that you indicated to Wells Fargo to
8 stop calling you?

9 MR. FREEMAN: Objection to
10 form. You can answer.

11 A. I attempted to call as we
12 spoke of, but...

13 Q. Okay. So we just went over
14 the logs, and for the 4589 number we did
15 not see any actual communications with an
16 agent. Is that correct?

17 A. That's correct.

18 Q. Okay. But for the 6128
19 number, you indicated per your logs two
20 communications. Is that correct?

21 A. Correct.

22 Q. Okay. So other than those
23 two communications, do you recall
24 independently or through your logs of any

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1 other communications with Wells Fargo?

2 MR. FREEMAN: Objection to
3 form. You can answer.

4 A. I don't -- I don't recall.

5 Q. Okay. Do you know if you
6 specifically used the words "stop
7 calling"?

8 A. I believe so. I don't
9 totally recall.

10 Q. Okay. If it was your
11 intention for calls to continue, because
12 as you've indicated you believe this is a
13 business to bring a TCPA lawsuit, why
14 would you tell the caller to stop
15 calling?

16 A. I was hopefully going to ask
17 my lawyers to do trebling with knowing
18 and willful.

19 Q. Can you explain to me what
20 that means?

21 A. From my understanding is if
22 a debt collector or a telemarketer
23 continues to call and they knowingly and
24 willingly continue to do it, it can be a

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1 fine of trebling.

2 Q. Okay. And is it your
3 understanding that knowing and willing
4 occurs after you've told a caller to stop
5 calling?

6 MR. FREEMAN: Objection.
7 Legal conclusion. You can answer.

8 MS. GUPTA: I'm asking about
9 her understanding.

10 THE WITNESS: That's my
11 understanding.

12 BY MS. GUPTA:

13 Q. Okay. So just to be extra,
14 have you told me about every time you
15 told Wells Fargo that they were calling
16 the wrong number?

17 A. I believe so.

18 Q. Okay.

19 MS. GUPTA: Why don't we
20 take a break since we have to
21 change the videotape, and then we
22 can use the restroom.

23 THE VIDEOGRAPHER: The time
24 is 11:31. We're off the record.

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1 purchasing these phones because you have
2 a business of bringing TCPA lawsuits?

3 A. Correct.

4 MR. FREEMAN: Are we done
5 with this, by the way?

6 MS. GUPTA: Yes.

7 BY MS. GUPTA:

8 Q. So when you buy these
9 phones, you know there's a chance that
10 they will ring, correct?

11 A. Possibly. Yes.

12 Q. Okay. And it's -- is it
13 your intention that these phones will
14 ring from a creditor?

15 A. Yes.

16 Q. Okay. And you are okay with
17 that?

18 A. Yes.

19 Q. Okay. So are you -- you're
20 assuming the risk that these phones will
21 ring. Is that correct?

22 A. Yes.

23 MR. FREEMAN: Objection.

24 Legal conclusion.

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1 MS. GUPTA: Okay.

2 MR. FREEMAN: You can
3 answer.

4 THE WITNESS: Yes.

5 BY MS. GUPTA:

6 Q. Are you purchasing these
7 phones purposefully to cause them to
8 ring?

9 A. Yes.

10 Q. Okay. And you understand
11 that the phones ringing is -- is with --
12 is it your intention that these phone
13 calls are going to result then in some
14 sort of a demand whether it's
15 pre-litigation or an actual lawsuit?

16 A. I believe so.

17 Q. Okay.

18 MS. GUPTA: This is what I
19 was showing you earlier.

20 (Whereupon, a document was
21 marked for identification as
22 Exhibit No. 11.)

23 BY MS. GUPTA:

24 Q. Ms. Stoops, please take a

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1 look at this document. I'll give you a
2 moment to look it over.

3 Okay. Have you seen this
4 document before?

5 A. No.

6 Q. Okay.

7 MR. FREEMAN: Just to
8 clarify, you mean not when you
9 previously showed it to her, you
10 mean prior to today?

11 BY MS. GUPTA:

12 Q. Not previously. Prior to
13 today, have you ever seen this document
14 which is entitled Taisha Campbell versus
15 Student Assistance Corporation?

16 A. Correct.

17 Q. And you had previously
18 indicated that you know somebody by the
19 name of Taisha Campbell. That's your
20 sister. Is that correct?

21 A. That's my sister. Correct.

22 Q. Okay. What is her address?

23 A. 124 Hemlock Road, Flinton,
24 PA, 16640.

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1 Q. And are you currently living
2 with her?

3 A. Yes.

4 Q. Are you close with your
5 sister?

6 A. Yes. Very much.

7 Q. You see her every day. Is
8 that correct?

9 A. I have not seen her for the
10 past three weeks because I was in
11 Florida.

12 Q. Okay. What were you doing
13 in Florida?

14 A. Visiting my grandchildren
15 and children.

16 Q. Okay. How long has Taisha
17 lived in Pennsylvania?

18 A. Over five years.

19 Q. Okay.

20 A. I believe.

21 Q. Have you talked with Taisha
22 about your TCPA lawsuits?

23 A. Somewhat, yes.

24 Q. Have you talked to her about

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1 (Beginning of the
2 Confidential portion of the
3 transcript.)

4 BY MS. GUPTA:

5 Q. Do you know an Eliot
6 Pereira?

7 A. No. No.

8 Q. Okay. Have you ever heard
9 the name Eliot Pereira prior to today?

10 A. I don't -- I don't believe
11 so.

12 Q. Okay. Are you aware that
13 he's a credit card customer of Wells
14 Fargo?

15 A. No. I did not know that.

16 Q. Do you know a Jonathan or
17 Joy Newman?

18 A. No, ma'am.

19 Q. Okay. Are you aware that
20 they are mortgage customers of Wells
21 Fargo?

22 A. No. I did not know them.

23 Q. Okay. Do you know anyone
24 who owes a debt to Wells Fargo?

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1 A. No, ma'am.

2 Q. Did you ever provide either
3 of the phone numbers here to Wells Fargo?

4 A. Yes.

5 MR. FREEMAN: Objection.

6 You can answer.

7 A. Yes. When I --

8 MS. GUPTA: Objection as
9 to...?

10 MR. FREEMAN: To form.

11 BY MS. GUPTA:

12 Q. Okay. Did you provide
13 either the 6128 or the 4589 number to
14 Wells Fargo directly?

15 A. When I sent the letter of
16 demand.

17 Q. But you did not provide the
18 phone numbers to them in order for them
19 to contact you. Is that correct?

20 A. No.

21 Q. Okay.

22 MS. GUPTA: That's the part
23 of the transcript that I was going
24 to mark as confidential. We're

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1 anything other than what I'm going to
2 represent to you of statutory damages,
3 \$500 for phone calls?

4 A. I'm sorry.

5 Q. Are you seeking anything
6 other than the damages under the TCPA,
7 the \$500 per phone call?

8 A. No.

9 Q. What damage did these phone
10 calls cause you exactly?

11 A. Well, the damages are that I
12 bought the phone. I went out and bought
13 the phone. I kept track of the phone
14 logs whenever they were ringing. I
15 documented those on the phone logs. I
16 kept the phone cards on the phones
17 themselves if they were ready to run out
18 of minutes or days. I kept the batteries
19 going.

20 Q. Anything else?

21 A. Not that I can think of.

22 Q. Are you claiming any
23 emotional distress here?

24 A. No.

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1 Legal conclusion. You can answer.

2 A. Other charges, no. No.

3 Q. Okay. So the only money
4 that you paid was to purchase the phone
5 and to add minutes to the phone?

6 A. Correct.

7 Q. Okay.

8 MS. GUPTA: I'm just going
9 to take a couple minutes to look
10 over my notes.

11 THE VIDEOGRAPHER: The time
12 is 12:09. We are off the record.

13 (A short break was taken.)

14 THE VIDEOGRAPHER: The time
15 is 12:13. We are back on the
16 record.

17 BY MS. GUPTA:

18 Q. Hi, Ms. Stoops. I just have
19 a few follow-up questions. We're almost
20 finished.

21 A. Okay.

22 Q. We had marked as Exhibit-10
23 your debit card statement. When did you
24 print that document?

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1 A. A couple days ago.

2 Q. Okay. Did you print that to
3 provide to your attorney?

4 A. Yes. Yes, ma'am.

5 Q. For the charges that you
6 incurred to purchase phones, were you
7 ever reimbursed for those? Did you pay
8 for the phones yourself or were you ever
9 reimbursed?

10 A. I always pay for them
11 myself.

12 Q. Okay. So there was no
13 reimbursement? Nobody paid you back for
14 any phones that you purchased?

15 A. No.

16 Q. Okay.

17 A. No.

18 Q. Which area codes did you
19 pick? You mentioned Florida, but which
20 specific area codes did you pick when
21 purchasing these phones?

22 MR. FREEMAN: Objection to
23 form. You can answer.

24 Q. Do you understand the

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1 question?

2 A. Yes. Yes. I normally
3 picked Florida.

4 Q. Okay.

5 A. Because that's where I'm
6 most familiar with.

7 Q. Okay. Do you know the
8 actual digits for the area code?

9 A. Yes.

10 Q. Can you tell me them?

11 A. 33813, 33811, and 33809.

12 Q. Those are the ZIP codes. Is
13 that correct?

14 A. Correct.

15 Q. Okay. Do you know what the
16 corresponding area codes are for the
17 phone numbers?

18 A. Yes. 863.

19 Q. Are they all 863?

20 A. I believe so.

21 Q. Okay. And when you purchase
22 phones for the ZIP codes, are you given a
23 phone with an area code of 863?

24 A. I believe so. Yes.

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1 Q. Okay. For our case, for the
2 two phone numbers at issue here, what is
3 the proof that you own the phones? What
4 is your proof that you own the phones?

5 MR. FREEMAN: Objection.

6 Legal conclusion. You can answer.

7 A. I have them in my purse
8 right now.

9 Q. Okay. So your proof is that
10 you carry them on you, that you have them
11 with you?

12 A. I have them with me today.

13 Q. Okay. Have you had them
14 with you or in your possession ever since
15 the date that you purchased the phones
16 which you had said was approximately
17 September --

18 A. Yes.

19 Q. -- of last year?

20 A. Yes.

21 Q. Okay. At any point were
22 they not in your possession?

23 A. No.

24 Q. How about when you travel?

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1 A. I take them with me.

2 Q. Okay. Do you take all 35 --
3 approximately 35 phones with you?

4 A. Yes, ma'am.

5 Q. With you at all times?

6 A. Yes, ma'am.

7 Q. For the phones that are
8 ringing, for example, during this
9 deposition, how -- are you keeping track
10 of them?

11 A. Yes, ma'am.

12 Q. How are you keeping track of
13 them?

14 A. On my phone logs.

15 Q. No. I mean, specifically
16 during this deposition, you're saying you
17 have it with you, 35 phones. Do you have
18 with you 35 phones today?

19 A. No. No, I don't. They're
20 back at the motel.

21 Q. Okay. So is it fair to say
22 you are not tracking phone calls during
23 the time frame that you are away from the
24 motel?

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1 filed lawsuits, I'm not talking about
2 demand letters, they were filed through
3 your current attorney?

4 A. Correct.

5 Q. Sabatini law firm, correct?

6 A. Yes. Yes. Correct.

7 Q. Okay. Do you know exactly
8 how many --

9 A. No, I don't.

10 Q. -- lawsuits? Okay.

11 We're talking more than five
12 lawsuits, correct?

13 A. I really don't know. I
14 really don't know.

15 Q. Okay. Do you know -- and
16 you can estimate if you don't know an
17 exact number -- how many TCPA claims that
18 the Manning law firm is assisting you
19 with?

20 A. I don't know.

21 Q. Is it more than one?

22 A. Yes.

23 Q. Is it more than two?

24 A. Yes.

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1 Q. More than five?

2 A. Yes.

3 Q. Okay. How about more than
4 ten?

5 A. Yes.

6 Q. More than 15?

7 A. Yes.

8 Q. Okay. I don't have to keep
9 going. Do you have an estimate?

10 A. I don't know. I don't know.

11 Q. More than 20?

12 A. Yes, but I don't know the
13 actual number.

14 Q. No. I understand.

15 A. Okay.

16 Q. More than 25?

17 A. Yes.

18 Q. Okay. More than 30?

19 A. Yes.

20 Q. Okay. So I guess I'm

21 confused. If you have 35 --

22 approximately 35 phones, maybe here and

23 there, a little bit more, a little bit

24 less, how is the Manning law firm